



September 15, 2021

Attn: Document Management Facility  
US Department of Transportation  
1200 New Jersey Avenue  
SE West Building Ground Floor Room W12-140  
Washington DC, 20590

**RE: Petition for Exemption**

To Whom it May Concern:

PJ Helicopters, Inc. is requesting exemption from certain Federal Aviation Regulations that impact our ability to utilize our Sikorsky UH-60A helicopters to perform Class B Human External Cargo (HEC) Operations. The following information is provided per the instructions in *14 CFR §11.81*:

**(A) Contact Information**

Seth Gunsauls  
VP & General Manager  
PJ Helicopters, Inc.  
903 Langley Way  
Red Bluff, CA 96080  
(530)527-5059  
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**(B) Specific Sections of 14 CFR from which we seek exemption:**

PJ Helicopters, Inc. seeks exemption from the following Federal Aviation Regulations as they hinder our ability to utilize our fleet to the fullest extent allowed:

*14 CFR 133.43 (a) and (b)* - regarding equipment used for Class B Human External Cargo (HEC) operations.

*14 CFR 91.9(a)* - Applicable to Mechanical Specialties Model 909 Cargo Hook STC (SR02617SE) Rotorcraft Flight Manual Supplement (Document MS-909-101-RFMS).

**(C) The extent of relief we seek, and the reason that we seek it:**

PJ Helicopters, Inc. seeks to obtain the maximal extent of relief permitted by law until a compliant safe system is available; or the rules governing this operation and certifying this equipment are revised to reflect the industry best and safe practices.

Reasoning for Request for Exemption from *14 CFR 133.43 (a) and (b)*:

PJ Helicopters, Inc. currently operates Sikorsky UH-60A helicopters under *14 CFR 133* in support of powerline construction and maintenance, as well as disaster relief. We seek exemption to allow us to conduct Class B Human External Cargo (HEC) operations to carry personnel performing an essential function in connection with the external-load operation or those who are necessary to accomplish the work activity directly associated with that external load



operation. These operations fall under Class B External Loads as detailed in *AC 133-1B Change 1 (3.4)*. However, per *14 CFR 133.43(a) and (b)*, rotorcraft performing Human External Cargo (HEC) operations must utilize External Load Attaching Means and Quick Release Devices meeting the certification requirements detailed in *14 CFR 27.865* or *CFR 29.865* as applicable for Class B (HEC) loads. Currently there aren't any cargo hooks available for the Sikorsky UH-60A helicopter that meet the Class B (HEC) requirements of *CFR 29.865*. Exemption from *14 CFR 133.43(a) and (b)* for the human external load requirements will allow PJ Helicopters, Inc. time to develop a solution that satisfies these demands.

Reasoning for Request for Exemption from *14 CFR 91.9(a)*:

PJ Helicopters, Inc. operates Sikorsky UH-60A helicopters certified under *14 CFR 21.25*. They're equipped with Mechanical Specialties Model 909 cargo hooks installed under *STC (SR02617SE)* that were required to meet *14 CFR 29.865* during certification. However, they were not tested for the human external cargo requirements during certification. Therefore, they have a non-human limitation in the Rotorcraft Flight Manual Supplement (*MS-909-101-RFMS*).

PJ Helicopters, Inc. seeks to use Mechanical Specialties *STC (SR02617SE)* for Class B Human External Cargo (HEC) operations until an alternate method of compliance is established.

**(D) The reason that granting our request would be in the best interest of the public:**

These specific exemptions would permit PJ Helicopters, Inc. to more versatily utilize our Sikorsky UH-60A helicopters in support of maintaining the reliability of the national electrical grid as well as disaster relief. The use of helicopters to support the national electrical grid has permitted utility companies to expand and maintain this critical infrastructure, thereby establishing energy reliability to the public. The implementation of Class B HEC in these roles ensures that majority of the operational functions are executed to a higher standard of safety when compared with alternative options. The electrical grid consists of powerlines that are often constructed in rough and mountainous terrain. These powerlines consist of many large structures that must be accessed by utility crews to maintain energy reliability. Class B HEC radically decreases the number of hazards associated with these operations. Listed are a few of the hazards that will observe a great reduction: Slips, trips and falls while operating in steep terrain; Fall risk while ascending and descending structures; Physical fatigue.

**(E) How the exemption would provide a level of safety at least equal to that provided by the rules from which we seek exemption:**

Class B HEC has been implemented and utilized for years without incidents related to the failure of the external load attaching means or the quick release device. PJ Helicopters, Inc. has been conducting Class B HEC operations for over 30 years without incident.

To ensure that the quick release device meets the required level of safety for Class B HEC operations, PJ Helicopters, Inc. will utilize a "Belly Band" Personal Safety Device (PSD) as described in *AC 133-1B Change 1 (4.5)*. This will secure the Human External Cargo (HEC) if the Primary Quick Release Device fails. The "Belly Band" (PSD) will be built, inspected, and used as described in *FAA InFO 12015*.

Additionally, PJ Helicopters, Inc. will incorporate into our FAA Approved Load Combination Flight Manual: all operation, training, personnel qualification, briefing, safety considerations, and communications as required in *FAA Order 8900.1 Volume 3 Chapter 51 (3-4085)*.

Safety while performing Human External Cargo (HEC) operations will be improved while utilizing the Sikorsky UH-60A helicopter. A two-pilot crew operating a twin-engine rotorcraft capable of single-engine flight contrasts with most Class B HEC operations currently performed in the United States. Most Class B HEC operations utilize single engine rotorcraft with a single pilot. Majority of the Class B HEC operations being conducted in support of powerline construction and



maintenance place the rotorcraft in the low-level wire environment. Maintaining an additional pilot in these scenarios will increase safety by adding an additional layer of situational awareness. Additionally, the Sikorsky UH-60A rotorcraft contains multiple redundant systems which are beneficial in demanding environments. Not only are they utilized by the United States, but multiple foreign operators worldwide.

**(F) Summary that can be published in the Federal Register:**

PJ Helicopters, Inc. proposes that it isn't necessary to publish a summary in the Federal Register because this exemption will not set the standard. Other exemptions to *14 CFR 133.43 (a) and (b)* as well as *14 CFR 91.9(a)* have been granted in similar circumstances.

Delaying will affect PJ Helicopters, Inc. and our customers adversely. We rely on Class B HEC as a primary source of income. Our customers require our services to ensure the reliability and functionality of the electrical grid. Class B HEC plays a vital role in restoring power in a timely manner.

If the FAA decides publishing a statement in the Federal Register is necessary, please use the following:

PJ Helicopters, Inc. requests exemption from *14 CFR 91.9(a)* and *14 CFR 133.43(a) and (b)* in order to conduct Human External Cargo (HEC) operations in support of powerline construction and maintenance, and disaster relief operations. The FAA has recommended that PJ Helicopters, Inc. and other operators comply with the HEC requirements of *14 CFR 27.865* and *14 CFR 29.865* for Class B HEC operations. The FAA has pointed to *14 CFR 133.43(a) and (b)* as the reason the HEC certification requirements found in either *14 CFR 27.865* or *14 CFR 29.865* apply to Class B HEC operations. The request to comply with *14 CFR 29.865* is detrimental to PJ Helicopters, our customers, and the public.

**(G) Additional information, views or arguments available to support our request:**

The listed documents are provided with this Petition for Exemption to assist in supporting our request:

- *14 CFR 133.43 (a) and (b)*
- *14 CFR 91.9(a)*
- *STC SR02617SE*
- *RFMS MS-909-101-RFMS*
- *AC 133-1B Change 1 (3.4)*
- *FAA info 12015, 8900.1 Volume 3 Chapter 51 (3-4085)*
- *AC133-1B Change 1 Section (4.5)*

**(H) Reason to exercise these privileges outside of the United States:**

PJ Helicopters, Inc. does not currently wish to exercise the privileges of this exemption outside of the United States.

Sincerely,



Seth Gunsauls  
VP & General Manager  
PJ Helicopters, Inc.



